

4. Identify and list each document and/or communication, whether oral or written, in support of your allegation that Rick Gaston, Ryan Ted, and Morgan Thompson “fail[ed] to properly supervise, control, direct, discipline and/or train Harrison County Correctional Officers to prevent ... constitutional violations ... including to Plaintiff....”

A. For each such document and/or communication, whether oral or written listed above, please describe with specificity how each document and/or communication relates specifically to Rick Gaston, Ryan Teel and Morgan Thompson.

**Answer to 4A:** All of the documents and/or communications as to how the defendants identified in this interrogatory did or failed to do the things set out in this interrogatory is not known to Plaintiff at this time; however, Plaintiff does rely on the stipulation of fact agreed to by Morgan Thompson and contained in the plea agreement filed on November 22, 2006, in the case of U.S.A. v. Morgan Lee Thompson, U.S. District Court, Southern District of Mississippi, Jackson Division, Cause Number 1:06cv116.

5. Identify and list each document and/or communication, whether oral or written, in support of your allegation that Rick Gaston was “vested with final decision making authority and responsibility to train, supervise, set policies and determine procedures, enforce policies and procedures, delegate authority and generally oversee and supervise the daily operations of the Harrison County Sheriff’s Booking Department within the Harrison County Adult Detention Center (HCADC).”

A. For each such document and/or communication, whether oral or

written listed above, please describe with specificity how each document and/or communication relates specifically to Rick Gaston.

**Answer to 5A:** All of the documents and/or communications as to how Rick Gaston was vested with the authority and responsibilities of the matters set out set out in this interrogatory is not known to Plaintiff at this time; however, the Booking Supervisor is given authority to continue booking procedure on a detainee on whom the proper paperwork is not available, per Harrison County Adult Detention Center Policy & Procedures Directives, Booking & Receiving, effective January 1, 2001. Captain Rick Gaston authored an Inter Office Memo, Subject: Handling of Inmates, dated April 12, 2005, addressed to All Booking Personnel, which memo authorized correction officers in the booking area to exercise discretion in determining whether an detainee/arrestee disruptive to the extent he should be placed in a holding cell specifically designated for disruptive detainees.

6. Identify and list each document and/or communication, whether oral or written, in support of your allegation that Ryan Teel "was vested with de facto final decision making authority and responsibility to train, supervise, set policies and determine procedures, enforce policies and procedures, delegate authority and generally oversee and supervise the daily operations of his specific shift of the Harrison County Sheriff's Booking Department within the Harrison County Adult Detention Center. (HCADC)."

- A. For each such document and/or communication whether oral or written listed above, please describe with specificity how each document and/or communication relates specifically to Ryan Teel.

**Answer to 6A:** All of the documents and/or communications as to how Ryan Teel was vested with de facto final decision-making authority and responsibilities of the matters set out set

out in this interrogatory is not known to Plaintiff at this time; however, the Booking Supervisor is given authority to continue booking procedure on a detainee on whom the proper paperwork is not available, per Harrison County Adult Detention Center Policy & Procedures Directives, Booking & Receiving, effective January 1, 2001.

7. Identify and list each document and/or communication, whether oral or written, in support of your allegation that Morgan Thompson was "directly and personally responsible for the safety and well being of all persons detained, confined, incarcerated or otherwise held, regardless of individual status within HCADC"

- A. For each such document and/or communication, whether oral or written listed above, please describe with specificity how each document and/or communication relates specifically to Morgan Thompson

**Answer to 7A:** All of the documents and/or communications as to how Morgan Thompson was directly and personally responsible for the well-being and safety of persons detained, confined, incarcerated or otherwise held at the HCADC may not be within Plaintiff's knowledge at this time; however, the policies and procedures on booking and receiving detainees per Harrison County Adult Detention Center Policy & Procedures Directives, Booking & Receiving, effective January 1, 2001, impose a responsibility on booking personnel to ensure safety and well-being of detainees. The Code of Ethics, particularly paragraph 5, Police Canons of Ethics contained in General Order #1, Harrison County Sheriff's Department, effective date January 3, 2000, requires Correction Officer Morgan Thompson to protect the "citizens in the United States through the upholding of the U.S. and Mississippi Constitution and laws." The fact that Morgan Thompson was trained in suicide prevention and suicide watch also supports the allegation of his responsibility to ensure the safety and well-being of detainees entrusted in

his custody and care during the booking process.

8. Identify and list each document and/or communication, whether oral or written, in support of your allegation that Rick Gaston, Ryan Teel and Morgan Thompson conspired to deprive Plaintiff and/or other inmates "professional medical care and related health services to inmates and detainee at the HCADC."

- A. For each such document and/or communication, whether oral or written listed above, please describe with specificity how each document and/or communication relates specifically to Rick Gaston, Ryan Teel and Morgan Thompson.

**Answer to 8A:** This answer will be supplemented.

9. Describe in detail and please list by hourly increments, the activities you participated in starting at 12:00 A.M. on October 3, 2005 through 12:00 A.M. on October 5, 2005.

**Answer to 9:** This answer will be supplemented.

10. Are you alleging that Rick Gaston, Ryan Ted and/or Morgan Thompson caused injury to your eyes, face, nose or any other part of your body while being detained at the Harrison County Adult Detention Center on October 4, 2005. If yes, please state:

- A. 'Where the alleged injuries occurred;
- B. The names of all person(s) who were present when the alleged injuries occurred;
- C. The time of the day when the alleged injuries occurred;
- D. All witnesses who may be called to testify that the alleged injuries were caused by Rick Gaston, Ryan Ted and/or Morgan



Thompson;

- E. All witness who you may call to testify that Rick Gaston, Ryan Teel, and/or Morgan Thompson encouraged or participated in any way in the alleged physical injuries you complain of;
- F. Describe any verbal communication your overheard *from* Rick Gaston, Ryan Teel and/or Morgan Thompson prior to, during the time of, and after the alleged incident on October 4, 2005.

**Answer 10:** To the best of my recollection and based on documents I have since the arrest, I was arrested on October 4, 2005, around 0300 or 0400 hours. I was arrested by Biloxi Police officer Kit Manning and an officer from another city and state who was assisting Officer Manning on that date. I may have been pulled or knocked off my bicycle and I may have received a minor or superficial bruise to my face. I was not taken to the Biloxi Police Department, but was taken to the Harrison County Adult Detention Facility (HCADC) on Larkin Smith Drive in Gulfport, Mississippi. I believe I was arrest for and charged with improper equipment (riding a bicycle without lights), possession of marijuana, public drunk, and disorderly conduct by using profanity. Almost immediately upon arriving in the booking area of the HCADC, I was taken into the shower and Correction Officers Morgan Thompson, Ryan Teel, and/or Thomas Moore (who may be known as Timothy Moore), assaulted me in various manners. The assault occurred after I fell in the shower while being escorted into the shower by two of the correction officers mentioned above. I believe they were taking me in there to change clothes. I was barefoot at the time and I slipped on the shower floor because it was wet and slippery. They kicked, struck, and punched in my face, my back, and other parts of my body, and otherwise assaulted me. I sustained severe injuries to my face and body as a result of the

assault against me by the corrections officers. I did not do anything to provoke or require them to beat me. I was not trying to escape from jail or anything of that sort or nature. I believe a nurse or some medical personnel came into the shower and looked at me and my injuries, but I don't believe I was taken to the medical block for any treatment or observation. I was not given proper medical care and treatment. While in the booking area, I believe Captain Rick Gaston, came down there and made some comments about how he would hate to see what the other person looked like that I was supposed to have been in a fight with. I recall Rick Gaston telling the correction officers mentioned above something to the effect that he could not keep covering for them. I was placed in a holding cell in the booking area.

Later during the morning hours of October 4, 2005, several hours after the assault, I was taken by some deputies of the Harrison County Sheriff's Department to the emergency room at Memorial Hospital at Gulfport for treatment. This was after my right eye was swollen shut, my lip busted, my nose busted or fractured as a result of the assault by the correction officers. The deputies left me there at the hospital and did not return to get me or did not otherwise take me back to the county jail.

11. Identify and list each document and/or communication, whether oral or written, in support of your allegation that Rick Gaston, Ryan Ted and Morgan Thompson participated in a "conspiratorial scheme to camouflage, cover-up, falsely explain and/or deny what in truth actually happened to Plaintiff."

A. For each such document and/or communication, whether oral or written listed above, please describe with specificity how each document and/or communication relates specifically to Rick Gaston, Ryan Teel and Morgan Thompson.